UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

1:20-cy-00316-JLS

Honorable: John L. Sinatra Jr.

FELIPPE MARCUS,

Plaintiff,

VS.

CITY OF BUFFALO, et al.,.

Defendant(s)

PLANTIFFS' MOTION TO COMPEL EXPERT DISCLOSURES

NOW COMES FELIPPE MARCUS, Plaintiff, In Propria Persona, and pursuant to Federal Rules of Civil Procedure, respectfully ask Defendant and their Counsel to disclose any expert they except to call.

The facts of this case are set forth in this court's opinion of March 25, 2021, and May 6, 2021, familiarity with which is assumed. It is sufficient to state here that Plaintiff filed charges against Defendant's and the City of Buffalo pursuant to 42 U.S.C. § 1983 for events arising out of his stay at the Group Holding Center, where he was held as a detainee.

Defendant's through their Corporation Counsel subsequently served their answers to the complaint on the following dates June 3, 2021, June 22, 2021, July 20, 2021, December 03, 2021.

Plaintiff served his first set of interrogatories upon the Defendant's. The Defendants' as of this date have failed to respond to the interrogatories and discovery, including response for production of document, and request for admission's.

Plaintiff has filed his list of expert witnesses with this Honorable Court, and counsel.

WHEREFORE, Plaintiff respectfully submits this Motion, in accordance with this Honorable Court scheduling order, dated February 1, 2022.

Dated: 10-6-2027

cc: File/FM

Respectfully submitted,

Mr. Felippe Marcus

2500 South Abilene Street

P. O. Box 441058

Aurora, Colorado 80044

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CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing parties a copy of the foregoing document by first class United States mail in a properly addressed envelope with adequate postage thereon.

The individuals served are:

Clerk of the Court U.S. District Court 304 U.S. Courthouse 68 Court Street Buffalo, New York 14202

David M. Lee
Assistant Corporation Counsel
65 Niagara Square, 11th Floor
Buffalo, New York 14202

PLAINTIFF'S MOTION TO COMPEL EXPERT DISCLOSURES

Respectfully submitted,

Dated: 10-6-2022

FELIPPE MARCUS

In Propria Persona

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